

HOLLY E. ESTES, ESQ.
Nevada Bar No. 11797
Estes Law, P.C.
605 Forest Street
Reno, Nevada 89509
Telephone (775) 321-1333
Facsimile (775) 321-1314
Email: hestes@esteslawpc.com
Counsel for Chapter 7 Trustee

ELECTRONICALLY FILED
January 23, 2024

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

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In Re:

SCOTT A. CORRIDAN,

Debtor.

Case No. 22-50366-hlb
Chapter 7

Adv. No. 23-05013-hlb

EDWARD M. BURR, in his capacity as
Chapter 7 Trustee for the bankruptcy estate
of SCOTT CORRIDAN,

Plaintiff,

vs.

STEVEN BALDWIN; TERRE
BALDWIN; BIG WATER
INVESTMENTS, LLC, a Nevada limited
liability company; ROCK & ROSE,
INC.; WOODBURN & WEDGE; and
KEVIN HOROWITZ, sole proprietor of
ST. HELENA CONSTRUCTION
COMPANY,

Defendants.

**NOTICE OF HEARING ON
TRUSTEE'S MOTION FOR
JUDGEMENT ON THE PLEADINGS
OR, IN THE ALTERNATIVE,
MOTION FOR SUMMARY
JUDGEMENT AGAINST ALL
DEFENDANTS ON CLAIMS 1-4 AND
6, AND REQUEST FOR COURT TO
DIRECT ENTRY OF FINAL
JUDGEMENT**

Hearing Date: March 29, 2024
Hearing Time: 1:30 p.m.

NOTICE IS HEREBY GIVEN that on January 12, 2024, Chapter 7 Trustee Edward M. Burr (the "Trustee"), filed his Motion for Judgement on the Pleadings or, in the Alternative, Motion for Summary Judgement Against All Defendants on Claims 1-4 and 6, and Request for Court to Direct Entry of Final Judgement [DE 20] (the "Motion") by electronic filing with the United States Bankruptcy Court, District of Nevada. The Motion requests judgement on the pleadings or in the alternative summary judgement against all Defendants on claims: (1) to determine the validity of Defendants' liens; (2) to

determine the Trustee's priority and to avoid Defendants' unperfected and invalid liens [11 U.S.C. §544]; (3) Declaratory Relief that Defendants' liens are invalid; (4) Trustee's Objections to Defendants' secured claims; and (6) to Recover Property Transferred [11 U.S.C. §550] and for the Court to direct entry of a final judgement.

NOTICE IS FURTHER GIVEN that if you do not want the court to grant the relief sought in the Motion, or if you want the Court to consider your views, you must file an opposition with the Court, and serve a copy on the person making the Motion ***no later 21-days after the date the Motion is served.*** See Local Rule 7056(c). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

If you object to the relief requested, you must file a **WRITTEN** response to this pleading with the court. You must also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may refuse to allow you to speak at the scheduled hearing; and
- The court may rule against you without formally calling the matter at the hearing.

Copies of the Motion may be obtained by written request from Estes Law, P.C. at the address above or may be obtained directly from the Bankruptcy Court's website at www.nvb.uscourts.gov (requires the establishment of a PACER account) or from the United States Bankruptcy Court Clerk's Office at 300 Booth Street, Reno, NV 89509, during the office hours of 9:00 a.m. to 3:30 p.m. weekdays.

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1 **NOTICE IS FURTHER GIVEN** that the hearing on the Motion will be held
2 before a United States Bankruptcy Judge, in the Clifton Young Federal Building, 300
3 Booth Street, Reno, Nevada 89509 Bankruptcy Courtroom 2, Fifth Floor. Any interested
4 party wishing to appear and participate at the hearing by phone may call the telephone
5 conference line 1 (669) 254-5252, Meeting ID 160 532 0260, Passcode 643758#.

6 DATED this 23rd day of January, 2024.

7 ESTES LAW, P.C.

8 By: /s/ *Holly E. Estes*
9 HOLLY E. ESTES, ESQ.
 Counsel for Chapter 7 Trustee

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28 **CERTIFICATE OF SERVICE**

1 I, Holly E. Estes, Esq., hereby certify that on the 23rd day of January,
2 2024, the foregoing document was served on all parties consenting to electronic service
3 in this case via the Court's CM/ECF system of the Bankruptcy Court.
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5 /s/ Holly E. Estes
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